

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., <u>et al.</u> ,) Case No. 01-01139 (JJF)
)
) (Jointly Administered)
Debtors.)

DECLARATION OF DANIEL L. ROURKE, Ph.D.

I, Daniel L. Rourke, declare the following to be true:

1. I am a Principal in Analysis Research Planning Corporation, a consulting firm that specializes in the estimation of liabilities for mass tort claims and the design of systems and procedures for such claims. I received my Ph.D. in Experimental Psychology in 1971 from the University of California at Los Angeles, with the concentration of my graduate work being in mathematical psychology and statistics. My professional background includes consulting work with KPMG Peat Marwick and the Resource Planning Corporation. I also have worked for the Arbitron Company and the RAND Corporation. My academic experience includes work at the Statistical Research Laboratory at the University of Michigan, Ann Arbor. As a result of my academic training and 30-year professional background, I have expertise in sample design and the design of large statistical databases and statistical analysis systems. I have personal knowledge of the matters set forth herein, and would be competent to testify thereto before this Court.

2. I have prepared a report titled "1997 and 2000 Grace Asbestos PI Claims Sample Design, Methodology and Results," which was filed with the Debtors' Reply Memorandum In Support Of Case Management Order on November 9, 2001. That report is a

true and accurate summary of the statistical analysis I performed of the 1997 and 2000 Grace personal injury asbestos claims, using information obtained from Grace's claim files and from the claims databases compiled by the Center for Claims Resolution and the Manville Personal Injury Settlement Trust. My analysis was performed in accordance with generally accepted standards for the statistical analysis of such claims, and it is my professional opinion that the results set forth in that report are accurate and reliable.

I declare under penalty of perjury that the foregoing is true and correct.


Daniel L. Rourke, Ph.D

Executed on November 12, 2001
in New York, New York